

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

In re:

TRACY NAPPER,

CASE NO.: 6:15-bk-01726-KSJ
Chapter 13

Debtor. /

CERTIFICATION OF NECESSITY OF REQUEST FOR EMERGENCY HEARING

I HEREBY CERTIFY, as a member of the Bar of the Court, that I have carefully examined the matter under consideration and to the best of my knowledge, information and belief formed after reasonable inquiry, all allegations are well grounded in fact and all contentions are warranted by existing law or a good faith argument for the extension, modification, or reversal of existing law can be made, that the matter under consideration is not interposed for any improper purpose, such as to harass, to cause delay, or to increase the cost of litigation, and there is just cause to request a consideration of the following pleading on an emergency basis:

EMERGENCY MOTION FOR ORDER CORRECTING
DEBTOR'S NAME ON PETITION

I CERTIFY FURTHER that there is a true necessity for an emergency hearing, specifically, because the petition should reflect the correct Debtor's name as soon as possible, but definitely prior to the 341 Meeting of Creditors.

I CERTIFY FURTHER that the necessity of this emergency hearing has not been caused by a lack of due diligence on my part, but has been brought about only by circumstances beyond my control or that of my client. I further certify that this motion is filed with full understanding of F.R.B.P. 9011 and the consequences of noncompliance with same.

Date: March 3, 2015

/s/ CHARLES W. PRICE, ESQ.
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